Remarks

Applicants thank the Examiner for returning the signed and initialed copies of the Information Disclosure Statements (PTO 1449) filed July 15, 2002 and August 5, 2004 that were included with the Office Action.

Claims 1-33 are pending in this application. Claims 1, 2, 11, 12, 21, and 22 are currently amended. Claims 32 and 33 are newly added. No claims are cancelled. No new subject matter has been added. In view of the following remarks, allowance of all the claims pending in the application is requested.

Rejection Under 35 U.S.C. § 102

Claims 1-31 are rejected under 35 U.S.C. 102(b) as being anticipated by Gilmour et al. (U.S. Patent No. 6,115,709). Applicant traverses this rejection on the following basis.

Claim 1 recites, among other things, generating a master category list including categories derived from a first set of keywords, generating a user category list including categories derived from the second set of keywords, and filtering the user category list by removing categories from the user category list that do not match categories included in the master category list. Independent claims 11 and 21 include similar recitations, among other things.

In an exemplary embodiment, a master category list may be generated based on a first set of keywords (see the Specification at page 12, lines 19-21). The first set of keywords may be extracted from a set of documents stored in one or more document repositories (see the Specification at page 12, lines 15-17). This set of documents may be selected by an administrator, or according to another criteria such as, an author, a type of document, or other criteria (see the Specification at page 12, lines 17-19). Categories may also be manually added to and/or deleted from the master category list (see the Specification at page 12, lines 21 and 22). A user category list of categories may be generated based on a second set keywords that may be extracted

from one or more documents associated with a user (see the Specification at page 11, lines 17-19). Some of the categories may be removed from the user category list by filtering the user category list using the master category list (see the Specification at page 11, lines 20-22).

The Examiner has alleged that the "user knowledge profile" of Gilmour reads on a master category list (see the Office Action at page 3, second paragraph). The Examiner has further asserted that col. 9, lines 1-20; and col. 18, lines 59-66 of Gilmour disclose filtering the generated category list by removing from the generated list those categories that are not included in the master category list (see the Office Action at page 3, third paragraph). However, neither of the passages of Gilmour cited by the Examiner include any reference to the aforementioned user knowledge profile (the alleged master category list of Gilmour).

At best, the portions of Gilmour relied on by the Examiner appear to disclose extracting knowledge terms from an e-mail message (see Gilmour at col. 9, lines 7-9), and updating a knowledge repository based on the extracted knowledge terms by adding new terms and counting repetitions of old terms (see Gilmour at col. 9, lines 16-20). In other words, Gilmour apparently is directed to updating a single set of extracted terms (*e.g.* the knowledge repository). Further, FIG. 8 of Gilmour appears to teach that all terms extracted in a term extraction operation 152 are assigned a confidence value at a confidence level value assigning operation 154 (see Gilmour at col. 14, lines 17-20). Therefore, Gilmour does not disclose generating a <u>master category list</u> including categories derived from a first set of keywords, generating a <u>user category list</u> including categories derived from the second set of keywords, and filtering the user category list by removing categories from the user category list that do not match categories included in the master category list.

Since Gilmour is deficient at least for failing to disclose all of the features of the claimed invention of independent claims 1, 11, and 21, the rejections of claims 1, 11, and 21 must be withdrawn. Claims 2-10, 12-20, and 22-31 depend from and add additional features to independent claims 1, 11, and 21, respectively. Therefore,

claims 2-10, 12-20, and 22-31 are allowable at least by virtue of their dependency, as well as for the features that they add to the independent claims.
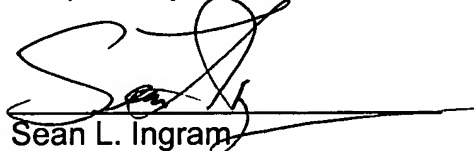
Newly Added Claims

Claims 32 and 33 are newly added. Newly added independent claim 32 includes subject matter similar to the subject matter in claim 1 discussed above. For the reasons previously set forth, claim 32 is allowable over the cited prior art. Claim 33 depends from claim 32 and is therefore allowable by virtue of its dependency, as well as for the features that it adds to claim 32.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Dated: December 1, 2004   Respectfully submitted,

Sean L. Ingram
Registration No.:   48,283
PILLSBURY WINTHROP LLP
1600 Tysons Blvd.
McLean, Virginia   22102
703-905-2000